

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ELIZABETH GOMES, EVA M. CONNORS,  
JENNIFER BOWEN, KATISHA  
SHOULDERS, KENNETH N. MARENGA,  
PAMELA PRISCO CARPENTER, STEVEN  
PETERS, ZHANNA KARP, Individually, and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

STATE STREET CORPORATION, STATE  
STREET BANK & TRUST COMPANY,  
NORTH AMERICA REGIONAL BENEFITS  
COMMITTEE OF STATE STREET  
CORPORATION, INVESTMENT  
COMMITTEE OF STATE STREET  
CORPORATION, and JANE and JOHN  
DOES 1-20,

Defendants.

No. 1:21-cv-10863-MLW

**JOINT MOTION REGARDING EXTENSION OF PLAINTIFFS' TIME TO FILE  
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AGREEMENT**

Plaintiffs Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, Zhanna Karp (collectively, "Plaintiffs") and Defendants State Street Corporation, State Street Bank & Trust Company, North America Regional Benefits Committee of State Street Corporation (currently known as U.S. Benefits Committee of State Street Corporation) and the Investment Committee of State Street Corporation (collectively, "Defendants"), by and through their undersigned counsel, hereby jointly move the

Court for certain extensions of time in connection with Plaintiffs' deadline to file their motion for final approval of class action settlement agreement:

1. On April 3, 2024, this Court preliminarily approved the Parties' Class Action Settlement Agreement (the "Preliminary Approval Order"), which resolves Plaintiffs Elizabeth Gomes, Eva M. Connors, Jennifer Bowen, Katisha Shoulders, Kenneth N. Marenga, Pamela Prisco Carpenter, Steven Peters, and Zhanna Karp (collectively, "Plaintiffs") class action claims against Defendants State Street Corporation, State Street Bank and Trust Company, North America Regional Benefits Committee of State Street Corporation, Investment Committee of State Street Corporation, and Jane and John Does 1-20 ("Defendants"), relating to the management of the State Street Salary Savings Program ("State Street Plan"). *See Dkt. 97.*

2. Since the Court's Preliminary Approval Order, the Parties have engaged Analytics Consulting, LLC as Settlement Administrator to carry out the responsibilities set forth in the Proposed Settlement Agreement.

3. Further, since the Court's Preliminary Approval Order, the Settlement Administrator has provided notice of the Settlement to the 22,000 Settlement Class Members.

4. Additionally, the Parties have worked diligently to prepare the final Settlement Agreement and Plan of Allocation.

5. The Parties have also engaged an Independent Fiduciary to review the Settlement pursuant to Department of Labor ("DOL") regulations to independently determine that the Settlement terms are reasonable.

6. The Parties respectfully request an extension of time of one week, to June 27, 2024, for Plaintiffs to file their final motion for final approval of the Class Action Settlement.

7. The Parties further request an extension of the deadline for the Independent

Fiduciary to file its approval of the Settlement terms to July 10, 2024.

8. The Parties further request an extension of one week for the deadline for any objections to any aspect of the Settlement, including objections any motion for attorneys' fees to be filed.

9. The Parties agree that the requested extensions are reasonable and are not intended for purposes of delay.

10. The requested extensions will not affect the following deadlines:

- a. the July 29, 2024 deadline for parties to file responses to any objections to the Settlement, and
- b. the August 8, 2024 Fairness Hearing.

11. No previous extensions have been requested by the Parties with regard to the filing of the Plaintiffs' motion in support of final approval for the Class Action Settlement.

WHEREFORE, the Parties hereby move the Court to grant the foregoing extension of time.

Dated: June 19, 2024

Respectfully submitted,

**SCOTT + SCOTT ATTORNEYS AT LAW LLP**

/s/Garrett W. Wotkyns

Garrett W. Wotkyns (admitted *pro hac vice*)

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**CERTIFICATE OF SERVICE**

I, Garrett W. Wotkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the non-registered participants as known this 19th day of June, 2024.

*/s/ Garrett W. Wotkins*

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Garrett W. Wotkins